

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: <b>DAWN MICHELLE MEAD,</b>	:	<b>Chapter 13</b>
Debtor,	:	<b>Case No. 5:21-bk-00181</b>
<b>LAKEVIEW LOAN SERVICING, LLC,</b>	:	
Movant(s),	:	<b>Motion for</b>
v.	:	<b>Relief from Stay</b>
<b>DAWN MICHELLE MEAD, and</b>	:	
Jack N. Zaharopoulos, Chapter 13 Trustee,	:	
Respondent(s),	:	

**ANSWER TO MOTION OF LAKEVIEW LOAN SERVICING FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **DAWN MICHELLE MEAD**, by and through their attorneys, FISHER CHRISTMAN, and in Answer to the Motion of **LAKEVIEW LOAN SERVICING** for Relief from Stay aver(s):

1-2. Admitted.

3. Denied. Upon information and belief, the Trustee is appointed by the Office of the United States Trustee.

4. Denied to the extent the document(s) referenced do(es) not speak for itself(themselves.)

5. Admitted.

6. Denied. Debtor made a payment of \$1,000 on or about February 20, 2021, a payment of \$1,309.07 on April 30, 2021 (and not \$1,307.32, which is indicated as received on May 5, 2021, on Docket Entry 34-3, the required postpetition payment history), a payment of \$1,307.32 on August 9, 2021, and a payment of \$1,000 on September 7, 2021. These payments are in addition to the payments listed on the required postpetition payment history filed with the Motion (or at least \$1.75 more in the case of the April 30, 2021, payment.)

7. Denied. As of the date of filing of the Motion, the amount of \$1,555.21 was due to reinstate the loan postpetition, but \$1,000 of that has already been paid.

8. Denied to the extent the averments of paragraph 8 constitute other than a statement or conclusion of law or misplaced request for relief. Movant is adequately protected by ongoing direct payments. Movant is also receiving distributions from the Trustee.

9. Denied. To the extent Movant's failure to track Debtor's payments resulting in Movant filing a premature Motion for Relief from Stay, there is no basis for the imposition of any attorneys' fee or costs on Debtor.

10. Denied to the extent the averments of paragraph 10 constitute other than a statement or conclusion of law or misplaced request for relief.

WHEREFORE, Debtor(s) **DAWN MICHELLE MEAD** respectfully prays this Honorable Court for an Order that the Motion of **LAKEVIEW LOAN SERVICING** for Relief from Stay be Denied and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER & CHRISTMAN

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